

[BeginText]

October 14, 2008  
via electronic filing

Ms. Rosa G. Lewis  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: SEIU COPE June Monthly Report (5/01/08-5/31/08)

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated September 12, 2008.

We are filing an amended report which will provide further clarifying information regarding the items referred to in your letter.

Your letter raised the question about whether the expenditure of \$12,500 paid to M & R Strategic Services should have been reported as a 24 hour notice. This expenditure was originally reported on a 24 hour report in the amount of \$12,264 on 5/26 based on an estimate. The actual bill of \$12,500 was paid on 5/29 and included on the monthly report as paid. The estimated amount reported earlier on the 24 hour report was included on the Form 3X as a memo entry and this will be deleted from the amended report to avoid confusion.

The third question in your letter concerned the independent expenditure supporting Gary Connelly. The expense was not paid until a subsequent period, and it was our intention to report it as a memo item on Schedule E and a debt on Schedule D, but this did not get transmitted correctly. It will be fixed in the amended report.

Your last question addressed three items that we have reviewed and determined should have been reported as Independent Expenditures on Schedule E. Each of these expenditures was a bill received and paid after the election date for activities that were already reported on 24 hour reports based on the estimate made before the activity was concluded. The expenditure for "salary and relateds for canvass workers" was part of an independent expenditure reported on 4/6/08. The expenditures for "phone banking" were part of an independent expenditure reported on 4/10/08. Each of these expenditures was for an additional expense in these previously reported independent expenditures programs but the amounts were not known until after the election when the bill was received and paid. These items will be included on the Schedule E of the amended report.

Please feel free to contact me if you have any further questions  
Sincerely,

John J. Sullivan  
Associate General Counsel  
Counsel for Government Affairs  
[EndText]